

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:18-CR-230-O

DENISE CROS-TOURE (01)  
MOHAMED TOURE (02)

**GOVERNMENT’S WITNESS LIST**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE REED O’CONNOR:

The United States Attorney of America, by and through the undersigned counsel,  
files this Government’s Witness List and would respectfully show this Court as follows:

	<b>Witness</b>	<b>Sworn</b>	<b>Testified</b>
1.	Brigette Ajufo  Ms. Ajufo may testify regarding her relationship with D.D. and the defendants; her observations of D.D.; and statements made by D.D. and the defendants.		
2.	Christine Ajufo  Ms. Ajufo may testify regarding her relationship with D.D. and the defendants; her observations of D.D.; and statements made by D.D. She may also testify about assisting D.D. escape the defendants’ house.		
3.	Kim Villa-Brown  Ms. Villa-Brown may testify about allowing D.D. to stay overnight at her apartment when D.D. escaped from the defendants; her observations of D.D.; and statements made by D.D.		

	<b>Witness</b>	<b>Sworn</b>	<b>Testified</b>
4.	<p>Maladho Diallo</p> <p>Ms. Diallo is D.D.'s mother. She may testify about D.D. leaving their village to work for the defendant Denise Cros-Toure's family in Conakry, Guinea, just prior to D.D. coming to the United States.</p>		
5.	<p>D.D.</p> <p>D.D. may testify regarding her background; her relationship to the defendants; the labor and services she provided for the defendants; her living conditions in the defendants' house; how the defendants treated her, including physical and non-physical harm she suffered, or believed she would suffer.</p>		
6.	<p>Hassan Dianne</p> <p>Mr. Dianne may testify regarding his relationship to the defendants and his observations of D.D. inside of the defendants' house.</p>		
7.	<p>Leslie Dompka</p> <p>Ms. Dompka may testify regarding her observations of D.D. outside of the defendants' house.</p>		
8.	<p>Mashid Golbarani</p> <p>Ms. Golbarani may testify regarding her relationship with D.D. and the defendants; her observations of D.D.; and statements made by D.D. and the defendants.</p>		

	<b>Witness</b>	<b>Sworn</b>	<b>Testified</b>
9.	<p>Supervisory Special Agent Keith Knowles U.S. Department of State, Diplomatic Security Service</p> <p>SSA Knowles may testify regarding the investigation of the defendants, including the immigration status of D.D.; international travel by D.D., the defendants, and the defendants' family members; and statements made by defendant Mohamed Toure.</p>		
10.	<p>Special Agent Katherine Langston U.S. Department of State, Diplomatic Security Service</p> <p>SA Langston may testify regarding the investigation of the defendants, including the immigration status of D.D.; international travel by D.D., the defendants, and the defendants' family members; and statements made by defendant Mohamed Toure.</p>		
11.	<p>Matthew Markovich, Digital Forensic Examiner U.S. Department of Justice, Civil Rights Division</p> <p>Mr. Markovich may testify about his qualifications in digital forensic examination and the process of such examinations. He may testify about D.D.'s devices, and specific items from the devices which he examined for this case.</p>		
12.	<p>(Ret.) Officer Darryl Mayhew Southlake Police Department</p> <p>Mr. Mayhew may testify about his employment with the Southlake Police Department; his encounter with D.D. and the defendants in 2002; his observations of D.D. and the defendants; and statements made by the defendants.</p>		

	<b>Witness</b>	<b>Sworn</b>	<b>Testified</b>
13.	<p>Joseph P. Mazza, Chief U.S. Department of State, Translating Division</p> <p>Mr. Mazza may testify that he certified the accuracy of the translation from French to English regarding an audio recording of D.D. and the defendants.</p>		
14.	<p>Anthony Meehan</p> <p>Mr. Meehan may testify regarding his relationship with D.D. and the defendants; his observations of D.D.; and statements made by D.D. and the defendants.</p>		
15.	<p>Arnetta Shams</p> <p>Ms. Shams may testify regarding her relationship with D.D. and the defendants; her observations of D.D.; and statements made by D.D. and the defendants.</p>		
16.	<p>Derrick Shepherd, Investigator U.S. Department of Labor, Wage &amp; Hour Division</p> <p>Mr. Shepherd may testify regarding his calculations of back wages owed D.D. in accordance with the Fair Labor Standards Act.</p>		
17.	<p>James Showers, Esq.</p> <p>Mr. Showers may testify regarding his professional and personal relationship with the defendants, specifically stating that he never provided personal or legal advice to the defendants about adopting D.D.</p>		

	Witness	Sworn	Testified
18.	Mary Thomson  Ms. Thomson may testify regarding her relationship with D.D. and the defendants; her observations of D.D.; and statements made by D.D. and the defendants.		
19.	Katy Wade  Ms. Wade may testify regarding her observations of D.D. outside of the defendants' house.		

Respectfully submitted,

s/ Rebekah J. Bailey

REBEKAH J. BAILEY

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 31, 2018, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following parties who have consented in writing to accept this Notice as service of this document by electronic means.

s/ Rebekah J. Bailey

REBEKAH J. BAILEY

Trial Attorney